

**MILLER & MARTIN PLLC**

ATTORNEYS AT LAW

1200 ONE NASHVILLE PLACE

150 FOURTH AVENUE, NORTH

NASHVILLE, TENNESSEE 37219-2433

615/244-9270

FAX 615/256-8197

OR

FAX 615/744-8466

WRITER'S DIRECT NUMBER

615/744-8572

CHATTANOOGA OFFICE

SUITE 1000 VOLUNTEER BUILDING

832 GEORGIA AVENUE

CHATTANOOGA, TENNESSEE 37402-2289

423/756-6600

FAX 423/785-8480

MELVIN J. MALONE  
NASHVILLE OFFICE

RECEIVED

2004 MAR 19 PM 3:44

T.R.A. DOCKET ROOM  
ATLANTA OFFICE  
SEVENTH FLOOR

1275 PEACHTREE STREET, N E

ATLANTA, GEORGIA 30309-3576

404/962-6100

FAX 404/962-6300

E-MAIL ADDRESS  
mmalone@millermartin.com

March 19, 2004

**VIA HAND DELIVERY**

Honorable Kim Beals, Esq., Hearing Officer  
c/o Sharla Dillon, Docket & Records Manager  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee, 37243-0505

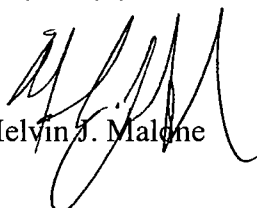
**RE: Petition of Celco Partnership d/b/a Verizon Wireless For Arbitration  
Under the Telecommunications Act of 1996  
TRA Consolidated Docket # 03-00585**

Dear Hearing Officer Beals:

Pursuant to the Procedural Schedule in the above-captioned matter, enclosed please find one (1) original and fourteen (14) copies of the First Set of Interrogatories of the CMRS Providers Directed to Each of the Members of the Rural Coalition of Small LECs and Cooperatives. Also enclosed is a motion related to the afore-referenced discovery. These documents have been served on all parties of record.

If you have any questions or need additional information, please let me know.

Very truly yours,

  
Melvin J. Malone

MJM/lw

Letter to Hon. Kim Beals

March 19, 2004

Page 2

cc: William T. Ramsey, Esq.  
Stephen G. Kraskin, Esq.  
Henry Walker, Esq.  
Paul Walters, Jr.  
Mark J. Ashby  
Suzanne Toller, Esq.  
Beth K. Fujimoto, Esq.  
James B. Wright  
Charles W. McKee  
Elaine Critides  
Dan Menser  
Marin Fettman  
Leon M. Bloomfield

# LIBRARY AUTHORITY

T.R.A. DOCKET ROOM

)
)
)
)
)
)
)
)
)
)

Consolidated Docket  
No. 03-00585

Petitioners Celco Partnership d/b/a Verizon Wireless (“Verizon Wireless”), AT&T Wireless PCS, LLC d/b/a AT&T Wireless (“AT&T Wireless”), BellSouth Mobility LLC; BellSouth Personal Communications, LLC; Chattanooga MSA Limited Partnership, collectively d/b/a Cingular Wireless (“Cingular Wireless”), Sprint Spectrum L.P. d/b/a Sprint PCS (“Sprint PCS”), and T-Mobile USA, Inc. (“T-Mobile”), collectively referred to herein as the CMRS Providers, propound this First Set of Interrogatories separately and independently upon each member of the Rural Coalition of Small LECs and Cooperatives, referred to separately and individually herein as Respondent, pursuant to the Rules of the Tennessee Regulatory Authority (“TRA” or “Authority”) and the Tennessee Rules of Civil Procedure. These Interrogatories include requests for copies of documents as provided by the Tennessee Rules of Civil Procedure. Answers must be served

consistent with the Procedural Schedule issued by the Hearing Officer in this matter. Each member of the Rural Coalition should provide separate answers to these Interrogatories, except to the extent that the answer to a particular question is the same for all or some portion of the Coalition members.

### **DEFINITIONS AND INSTRUCTIONS**

1. "And" and "Or" shall mean "and/or."
2. "Affiliate" shall have the meaning as defined in 47 USC § 153(1).
3. "Communication" or "communications" shall mean all meetings, conversations, conferences, discussions, correspondence, messages, telegrams, telefax, mailgrams, and all oral and written expressions or other occurrences whereby thoughts, opinions or data are transmitted between two or more persons.
4. "CMRS" and "Commercial Mobile Radio Service" shall have the meaning defined and used by the Federal Communications Commission. *See* 47 C.F.R. §§ 20.3, 20.9(a)(4), (7), (11).
5. "Concerning" and "concern" shall mean memorializing, mentioning, to be connected with, comprising, consisting, indicating, describing, referring, relating to, evidencing, showing, discussing, or involving in any way whatsoever the subject matter of the Interrogatory.
6. "Documents" as used herein shall mean every original and every non-identical copy of any original of all mechanically written, handwritten, typed or printed material, electronically stored data, microfilm, microfiche, sound recordings, films, photographs, slides, and other physical objects of every kind and

description containing stored information, including but not limited to, all transcripts, letters, notes, memoranda, tapes, records, telegrams, periodicals, pamphlets, brochures, circulars, advertisements, leaflets, reports, research studies, test data, working papers, drawings, maps, sketches, diagrams, blueprints, graphs, charts, diaries, logs, agreements, contracts, rough drafts, analyses, ledgers, inventories, financial information, books of account, understandings, minutes of meetings, minute books, resolutions, assignments, computer printouts, purchase orders, invoices, bills of lading, written memoranda or notes of oral communications, and any other tangible thing of whatever nature.

7. “Identify” or “state the identity of” means:

(a) In the case of a person, to state the name; last known residence; employer or business affiliation; and occupation and business position held.

(b) In the case of a company, to state the name; if incorporated, the place of incorporation; the principal place of business; and the identity of the person(s) having knowledge of the matter with respect to which the company is named.

(c) In the case of a document, to state the identity of the person(s) who prepared it; the sender and recipient; the title or a description of the general nature of the subject matter; the date of preparation; the date and manner of distribution and publication; the location of each copy and the

identity of the present custodian; and the identity of the person(s) who can identify it.

(d) In the case of an act or event, to state a complete description of the act or event; when it occurred; where it occurred; the identity of the person(s) performing said act (or omission); the identity of all persons who have knowledge, information or belief about the act; when the act, event, or omission first became known; the circumstances; the manner in which such knowledge was first obtained; and the documents or other writings which memorialize the instance.

8. "Oral communication" shall mean any verbal conversation or other statement from one person to another, including but not limited to, any interview, conference, meeting or telephone conversation.

9. "Person" or "Persons" shall mean any individual, association, partnership, corporation, firm, organization, or entity.

10. "Refer," "referring to," "relate," and "relating to" shall mean having a legal, factual or logical connection, relationship, correlation, or association with the subject matter of the request.

11. "Respondent," "you" and "your" shall mean or refer to each member of the Rural Independent Coalition separately and individually, its predecessor(s), if any, as well as its divisions, parent and subsidiary entities, all related companies, and the officers, directors, employees, agents, representatives, and other personnel

thereof, and any entity through which Respondent provides telephone service in Tennessee.

12. "Telecommunications carrier" shall have the same meaning as defined in 47 USC § 153(44).

13. "Telecommunications service" shall have the same meaning as defined in 47 USC § 153(46).

14. "Telecommunications Traffic" shall have the same meaning as defined in 47 CFR § 51.701(b)(1) with respect to traffic between Respondent and a Telecommunications carrier other than a CMRS carrier, and as defined in 47 CFR § 51.701(b)(2) with respect to traffic between Respondent and a CMRS carrier.

15. "BellSouth" shall mean BellSouth Telecommunications, Inc., an incumbent local exchange carrier which provides telecommunications services in Tennessee.

16. "Verizon Wireless" shall mean Cellco Partnership; Verizon Wireless Tennessee Partnership, collectively d/b/a Verizon Wireless.

17. "AT&T Wireless" shall mean AT&T Wireless PCS, LLC d/b/a AT&T Wireless.

18. "Cingular Wireless" shall mean BellSouth Mobility LLC; BellSouth Personal Communications, LLC; Chattanooga MSA Limited Partnership, collectively d/b/a Cingular Wireless.

19. "Sprint PCS" shall mean Sprint Spectrum L.P. d/b/a Sprint PCS.

20. "T-Mobile" shall mean T-Mobile USA, Inc. and its Affiliates, including PowerTel Memphis, Inc., PowerTel Kentucky, Inc., PowerTel Birmingham, Inc. and PowerTel Atlanta, Inc.

21. "CMRS Providers" shall mean Verizon Wireless, AT&T Wireless, Cingular Wireless, Sprint PCS and T-Mobile collectively.

22. "CMRS carrier(s)" shall mean any and all Telecommunications carriers that are authorized to provide wireless Telecommunications service within the State of Tennessee.

23. Unless otherwise noted or required by context, the relevant geographic area covered by these requests is the State of Tennessee.

24. Words of gender shall be construed as including all genders, without limitation.

25. Words in the singular shall be construed to mean the plural or vice versa as appropriate.

26. If you object to any Interrogatory or Interrogatory subpart, or otherwise withhold responsive information because of the claim of privilege, work product, or other grounds:

(a) identify the Interrogatory question and subpart to which objection or claim of privilege is made;

(b) state whether the information is found in a document, oral communication, or in some other form;



(c) identify all grounds for objection or assertion of privilege, and set forth the factual basis for assertion of the objection or claim of privilege;

(d) identify the information withheld by description of the topic or subject matter, the date of the communication, and the participants; and

(e) identify all persons having knowledge of any facts relating to your claim of privilege.

27. If you object to any portion of an Interrogatory, explain your objection and answer the remainder.

28. The information requested herein is intended to include all knowledge and information of Respondent in its corporate capacity, and includes, unless otherwise specifically indicated, its predecessors, agents, legal representatives, divisions, subsidiary entities, both controlled and wholly-owned, and all other related companies (as defined by 15 U.S.C. § 1127), and the past and present officers, directors, employees, agents, representatives, attorneys and other personnel thereof, as well as each entity through which Respondent provides telephone service in Tennessee.

29. These Interrogatories are deemed continuing in nature, requiring Respondent to serve upon Petitioners further responses promptly after Respondent has acquired additional knowledge or information.

## **INTERROGATORIES**

### **I. EXISTING ARRANGEMENTS**

#### **A. Written Agreements**

I-1. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months pursuant to a written agreement. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists and was filed with the TRA, please identify the Docket No. and sufficient additional detail to permit a copy of such agreement, including any and all amendments thereto, to be requested and obtained from the TRA.

I-2. For each Telecommunications carrier identified in response to Interrogatory I-1 with whom a written agreement exists that has not been filed with the TRA, please provide a copy of such agreement, as well as all amendments thereto.

#### **B. Unwritten Agreements**

I-3. Excluding the CMRS Providers, please identify each Telecommunications carrier to whom you have originated any Telecommunications Traffic or from whom you have terminated any Telecommunications Traffic either directly or indirectly during the past 12 months without the benefit of a written agreement.

I-4. For each Telecommunications carrier identified in response to Interrogatory I-3, please identify whether the traffic is being originated or terminated based upon agreed terms and, if so, please identify any agreed upon rate for the termination and/or transport of such traffic, traffic ratio(s) and (if the Telecommunications carrier is a CMRS carrier) interMTA factor(s).

### **C. Affiliates**

I-5. Please identify each Telecommunications carrier identified in response to Interrogatory I-1, I-2 or I-3 that is either an Affiliate to you, or is an Affiliate to another person or entity to which you are also an Affiliate.

### **D. Bill and Keep Agreements**

I-6. Provide the names of all Telecommunications carriers with which you currently exchange any traffic on a bill and keep basis.

- a. Describe the traffic subject to such agreement.
- b. Describe how the traffic subject to bill and keep is routed and rated.

## **II. BASIS FOR TRANSPORT AND TERMINATION RATES**

I-7. For each transport rate, termination rate and interconnection facility rate that may be contained in an agreement identified in response to Interrogatories I-1 (written agreements filed with the TRA), I-2 (written but unfiled agreements) and/or I-3 (unwritten agreements), please describe how the rate, and each of its elements, is calculated.

I-8. For each transport rate, termination rate and interconnection facility rate described in response to Interrogatory I-6, please state whether you contend

that the rate is based on the forward-looking economic cost for you to provide such transport, termination, and interconnection facility, and provide a copy of each and every cost study, including all supporting documentation relating to establishment of such rates.

I-9. What are the respective rates that each Respondent proposes for transport and termination of (a) Telecommunications Traffic exchanged on a direct basis with the CMRS Providers and (b) Telecommunications Traffic exchanged on an indirect basis with the CMRS Providers?

I-10. For each rate provided in response to Interrogatory I-8 (regarding rates proposed for the transportation and termination of Telecommunications Traffic exchanged with the CMRS Providers), please describe how the rate, and each of its elements, is calculated. Please include in your answer identification of each distinct network function that you contend is required to provide each termination arrangement.

I-11. For each rate provided in response to Interrogatory I-8 (regarding rates proposed for the transportation and termination of Telecommunications Traffic exchanged with the CMRS Providers), please identify and provide copies of all cost models, cost inputs, and cost assumptions relating to the rate, projected traffic demand and growth assumptions, including all supporting documentation of any network functionality that you use to terminate a call originated by the CMRS Providers. Please include in your response functioning electronic copies of the cost models, populated with the inputs and assumptions used by Respondent, in a

format that allows the user to change inputs and assumptions and recalculate results.

I-12. Have any of the rates that you propose for transport and termination of Telecommunications Traffic exchanged with the CMRS Providers been approved by the TRA? If so, please identify the decision and provide a copy.

### **III. FACILITIES AND TRANSIT COSTS**

#### **A. Combined Traffic Delivered Over Same Trunk Group**

I-13. Please identify where (i.e., physical interconnection location(s)) and how (i.e. type of trunk group, and nature of traffic currently exchanged over each trunk group) Respondent's network is currently interconnected with the BellSouth network.

I-14. Do you contend that you need to install any additional facilities or augment any existing facilities in order to provide direct or indirect connection to the CMRS Providers pursuant to the interconnection agreement that is the subject of this proceeding? If so, please describe in detail the additional and augmented facilities and state why they are necessary.

I-15. Does BellSouth currently combine CMRS Provider traffic with other traffic types and deliver such combined traffic to you over the same trunk group(s)? If so, please identify each trunk group over which combined traffic is delivered to you by BellSouth, and each type of traffic that you contend BellSouth has combined for delivery over that trunk group.

I-16. For each type of traffic that BellSouth delivers to you, please state what call detail information BellSouth provides to you, if any, that identifies such traffic by traffic type, message quantity, call duration, or originating party.

I-17. Do you currently bill inter-exchange carriers (IXCs) for either originating or terminating minutes of use? If so, please describe what call detail information is provided to you by BellSouth and/or the IXCs, if any, which you in turn use to bill the IXC(s)? Is the IXC traffic combined with other traffic?

#### **B. Shared Facility Costs**

I-18. Does Respondent agree that it is obligated to share with the CMRS Providers the cost of the facilities used for direct interconnection between the CMRS Providers and Respondent? If so, please describe in detail your proposal for the sharing of the cost of the facilities? If not, explain the legal basis for your position.

I-19. Does Respondent agree to share with BellSouth the cost of the facilities used for indirect interconnection between the CMRS Providers and Respondent? If so, please describe in detail your proposal for the sharing of the cost of the facilities?

I-20. If a CMRS Provider orders an interconnection facility that directly connects a Respondent switch to the CMRS Provider's switch located outside Respondent's geographic service area boundary, does Respondent contend that it is relieved of the responsibility to share the cost associated with the portion of the interconnection facility that extends beyond Respondent's exchange boundary? If

so, please identify the authority that relieves Respondent of such cost sharing responsibility.

### **C. Transit Costs**

I-21. Does Respondent contend that there is any FCC Rule or other authority which requires transit charges associated with the delivery of land-originated Telecommunications traffic sent through a third-party tandem to be paid by the terminating CMRS provider? If so, please identify the rule(s) or other authority.

## **IV. TRAFFIC RATIOS**

I-22. What is the approximate ratio of (a) Telecommunications Traffic originated by your landline customers and delivered to each of the CMRS Providers (land-to-mobile) to (b) Telecommunications Traffic that each of the CMRS Providers respectively originates to you (mobile-to-land)?

I-23. With respect to any traffic ratio identified in Interrogatory I-20, please provide all supporting data, including but not limited to traffic studies, traffic reports, and any other documentation which supports that traffic ratio.

## **V. ROUTING AND DIALING PARITY**

I-24. Is Respondent currently sending any Telecommunications Traffic originated by its landline customers to any of the CMRS Providers through trunk groups which connect Respondent to BellSouth tandem facilities? If so, please state the monthly volume of that Telecommunications traffic.

I-25. If Respondent is currently sending any Telecommunications Traffic originated by its landline customers to any of the CMRS Providers through trunk groups which connect Respondent to BellSouth's tandem facilities, to what extent is that traffic dialed by Respondent's landline customers on a non-toll, 7 or 10 digit basis?

I-26. Excluding the CMRS Providers, does Respondent send any Telecommunications Traffic originated by its landline customers to any other Telecommunications carrier, or terminate Telecommunications Traffic from any other Telecommunications carrier, through trunk groups which connect Respondent to BellSouth tandem facilities? If so, please identify each Telecommunications carrier, and state to what extent traffic originated by Respondent's landline customers to such Telecommunications carrier may be dialed on a non-toll, 7 or 10 digit basis.

I-27. Please describe how Respondent determines whether a call originated by one of Respondent's landline customers to a CMRS carrier's NPA-NXX should be sent as either a) a non-toll 7 digit dialed call, b) a non-toll 10 digit dialed call, or c) a 1+ toll call.

I-28. Please identify whether or not Respondent provides calling from its landlines to CMRS NPA-NXXs rated in rate centers that are within Respondent's local calling area on a non-toll basis. Please describe how such calls are routed.

I-29. Please identify whether or not Respondent provides calling from its landlines to CMRS NPA-NXXs rated in rate centers that are Metropolitan Area



Calling ("MAC") plan or Extended Area Service ("EAS") rate centers on a non-toll basis. Please describe how such calls are routed.

## **V. SWITCH INFORMATION**

I-30. Identify all switches owned by you, the wire center location and CLLI codes in which each switch is located, the number of switched residential, business, and public lines served by each switch, and the number of non-switched (e.g., special access, dedicated circuits, etc.) served out of each wire center belonging to you

I-31. Identify each tandem and end office switch owned by you, describe how traffic originated by the CMRS Providers is received by each tandem or end office from BellSouth, and identify and describe all arrangements related to the cost of the facilities used to transit this traffic to each tandem or end office.

I-32. For each ICO tandem or end office switch you own, describe in detail how traffic from your customers is delivered to the customers' IXC(s), and describe all arrangements related to the cost of the facilities used to carry this traffic.

I-33. Identify all of your tandem or end office switches connected to a BellSouth tandem with two-way Feature Group C trunks.

I-34. Identify all of your tandem switches which are connected to end-offices of other Telecommunications carriers as well as the name(s) of those Telecommunications carriers.

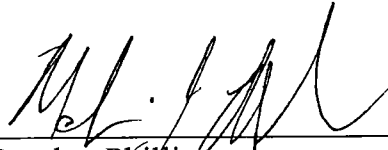
## **VI. MISCELLANEOUS**

I-35. Does Respondent have an Affiliate relationship with either another Telecommunications carrier, or is Respondent an Affiliate to another entity that has an Affiliate, which offers intra-lata toll or IXC services to Respondent's landline customers? If so, please identify the Telecommunications carrier that offers such services to Respondent's landline customers.

I-36. Does Respondent contend there is any FCC Rule or other authority that excludes the reciprocal compensation requirements of 47 U.S.C. § 251(b) (5) from applying to land-originated Telecommunications Traffic that is delivered to a CMRS carrier via an intra-lata toll or IXC? If so, please identify each FCC rule or other authority that provides such an exclusion.

I-37. Provide copies of your audited financial statements for 2000, 2001, 2002 and 2003.

I-38. Provide a copy of your most recent access rate cost study.



J. Barclay Phillips  
Melvin J. Malone  
Miller & Martin, PLLC  
1200 One Nashville Place  
150 4<sup>th</sup> Avenue North  
Nashville, Tennessee 37219-2433  
(615) 244-9270

Counsel for Cellco Partnership d/b/a  
Verizon Wireless

On Behalf of the CMRS Providers

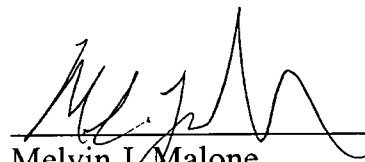
DATED: March 19, 2004

## CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2004, a true and correct copy of the foregoing has been served on the parties of record, via the method indicated:

<input checked="" type="checkbox"/>	Hand	William T. Ramsey Neal & Harwell 150 Fourth Avenue North, Suite 2000 Nashville, TN 37219-2498
<input type="checkbox"/>	Mail	
<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	Overnight	
<input checked="" type="checkbox"/>	Hand	Stephen G. Kraskin Kraskin, Lesse & Cosson, LLP 2120 L Street NW, Suite 520 Washington, D.C. 20037
<input checked="" type="checkbox"/>	Mail	
<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	Overnight	
<input checked="" type="checkbox"/>	Electronically	
<input type="checkbox"/>	Hand	Henry Walker Boult, Cummings, Connors & Berry, PLC 414 Union Street, Suite 1600 PO Box 198062 Nashville, TN 37219
<input checked="" type="checkbox"/>	Mail	
<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	Overnight	
<input checked="" type="checkbox"/>	Hand	J. Gray Sasser Miller & Martin LLP 1200 One Nashville Place 150 Fourth Avenue North Nashville, Tennessee 37219
<input type="checkbox"/>	Mail	
<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	Overnight	
<input type="checkbox"/>	Hand	Paul Walters, Jr. 15 East 1 <sup>st</sup> Street Edmond, OK 73034
<input checked="" type="checkbox"/>	Mail	
<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	Overnight	
<input checked="" type="checkbox"/>	Hand	Mark J. Ashby Cingular Wireless 5565 Glennridge Connector Suite 1700 Atlanta, GA 30342
<input type="checkbox"/>	Mail	
<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	Overnight	

<input type="checkbox"/>	Hand	Suzanne Toller
<input checked="" type="checkbox"/>	Mail	Davis Wright Tremaine LLP
<input type="checkbox"/>	Facsimile	One Embarcadero Center, #600
<input type="checkbox"/>	Overnight	San Francisco, CA 94111-3611
<input type="checkbox"/>	Hand	Beth K. Fujimoto
<input checked="" type="checkbox"/>	Mail	AT&T Wireless Services, Inc.
<input type="checkbox"/>	Facsimile	7277 164 <sup>th</sup> Ave., NE
<input type="checkbox"/>	Overnight	Redmond, WA 90852
<input type="checkbox"/>	Hand	James B. Wright
<input checked="" type="checkbox"/>	Mail	Sprint
<input type="checkbox"/>	Facsimile	14111 Capital Boulevard
<input type="checkbox"/>	Overnight	Wake Forest, NC 27587
<input type="checkbox"/>	Hand	Charles McKee
<input checked="" type="checkbox"/>	Mail	Sprint PCS
<input type="checkbox"/>	Facsimile	6450 Sprint Parkway, MailStop 2A553
<input type="checkbox"/>	Overnight	Overland Park, KS 66251
<input type="checkbox"/>	Hand	Elaine Critides
<input checked="" type="checkbox"/>	Mail	Verizon Wireless
<input type="checkbox"/>	Facsimile	1300 I Street, N.W.
<input type="checkbox"/>	Overnight	Washington, D.C. 20005
<input type="checkbox"/>	Hand	Dan Menser
<input checked="" type="checkbox"/>	Mail	Sr. Corporate Counsel
<input type="checkbox"/>	Facsimile	T-Mobile USA, Inc.
<input type="checkbox"/>	Overnight	12920 SE 38 <sup>th</sup> Street
		Bellevue, WA 98006
<input type="checkbox"/>	Hand	Marin Fettman
<input checked="" type="checkbox"/>	Mail	Corporate Counsel, Regulatory Affairs
<input type="checkbox"/>	Facsimile	T-Mobile USA, Inc.
<input type="checkbox"/>	Overnight	12920 SE 38 <sup>th</sup> Street
		Bellevue, WA 98006
<input type="checkbox"/>	Hand	Leon M. Bloomfield
<input checked="" type="checkbox"/>	Mail	Wilson & Bloomfield LLP
<input type="checkbox"/>	Facsimile	1901 Harrison St., Suite 1630
<input type="checkbox"/>	Overnight	Oakland, CA 94612

A handwritten signature in black ink, appearing to read 'Melvin J. Malone', is written over a horizontal line.

Melvin J. Malone  
J. Barclay Phillips  
Miller & Martin, PLLC

RECEIVED

2004 MAR 19 PM 3:44

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY**

In Re:

Cellco Partnership d/b/a  
Verizon Wireless For Arbitration Under  
the Telecommunications Act of 1996

Consolidated Docket  
No. 03-00585

**MOTION REGARDING CMRS PROVIDERS' FIRST SET OF INTERROGATORIES**

Petitioners Cellco Partnership d/b/a Verizon Wireless ("Verizon Wireless"), AT&T Wireless PCS, LLC d/b/a AT&T Wireless ("AT&T Wireless"), BellSouth Mobility LLC; BellSouth Personal Communications, LLC, Chattanooga MSA Limited Partnership, collectively d/b/a Cingular Wireless ("Cingular Wireless"), Sprint Spectrum L.P. d/b/a Sprint PCS ("Sprint PCS"), and T-Mobile USA, Inc. ("T-Mobile"), collectively referred to herein as the CMRS Providers, hereby jointly move and respectfully request the Tennessee Regulatory Authority ("TRA" or "Authority") to permit the CMRS Providers to propound more than forty (40) discovery requests upon the Members of the Rural Coalition of Small LECs and Cooperatives.

**GROUND FOR GRANTING MOTION**

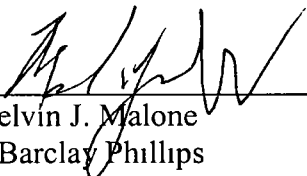
The petitions for arbitration filed by the CMRS Providers were consolidated by the Authority on December 8, 2003. Consistent with the consolidation, and to reduce administrative burdens on both the parties and the TRA, the CMRS Providers have prepared and submitted discovery requests jointly. For these reasons, to the extent the First Set of Interrogatories of the CMRS Providers Directed to Each of the Members of the Rural Coalition of Small LECs and

Cooperatives are deemed to exceed the Authority's prescribed limits, it is both reasonable and appropriate to permit the CMRS Providers to exceed the amount of discovery requests set forth in the TRA's Rules of Practice and Procedure.

### **CONCLUSION**

Pursuant to the foregoing, the CMRS Providers respectfully request the TRA to grant their motion as concerning the discovery requests filed simultaneously with this motion. Granting this motion is supported by sound precedent and preserves valuable resources

Respectfully submitted,



Melvin J. Malone  
J. Barclay Phillips  
Miller & Martin, PLLC  
1200 One Nashville Place  
150 Fourth Avenue North  
Nashville, TN 37219-2433  
(615) 244-9270

Counsel for Cellco Partnership d/b/a  
Verizon Wireless

On Behalf of the CMRS Providers

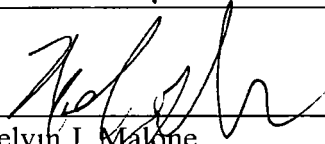


## CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2004, a true and correct copy of the foregoing has been served on the parties of record, via the method indicated:

<input checked="" type="checkbox"/>	Hand	William T. Ramsey Neal & Harwell 150 Fourth Avenue North, Suite 2000 Nashville, TN 37219-2498
<input type="checkbox"/>	Mail	
<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	Overnight	
<input type="checkbox"/>	Hand	Stephen G. Kraskin Kraskin, Lesse & Cosson, LLP 2120 L Street NW, Suite 520 Washington, D.C. 20037
<input checked="" type="checkbox"/>	Mail	
<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	Overnight	
<input checked="" type="checkbox"/>	Electronically	
<input type="checkbox"/>	Hand	Henry Walker Boult, Cummings, Connors & Berry, PLC 414 Union Street, Suite 1600 PO Box 198062 Nashville, TN 37219
<input checked="" type="checkbox"/>	Mail	
<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	Overnight	
<input checked="" type="checkbox"/>	Hand	J. Gray Sasser Miller & Martin LLP 1200 One Nashville Place 150 Fourth Avenue North Nashville, Tennessee 37219
<input checked="" type="checkbox"/>	Mail	
<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	Overnight	
<input type="checkbox"/>	Hand	Paul Walters, Jr 15 East 1 <sup>st</sup> Street Edmond, OK 73034
<input checked="" type="checkbox"/>	Mail	
<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	Overnight	
<input type="checkbox"/>	Hand	Mark J. Ashby Cingular Wireless 5565 Glennridge Connector Suite 1700 Atlanta, GA 30342
<input checked="" type="checkbox"/>	Mail	
<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	Overnight	
<input checked="" type="checkbox"/>	Hand	Suzanne Toller Davis Wright Tremaine LLP One Embarcadero Center, #600 San Francisco, CA 94111-3611
<input checked="" type="checkbox"/>	Mail	
<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	Overnight	

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hand Mail	Beth K. Fujimoto AT&T Wireless Services, Inc. 7277 164 <sup>th</sup> Ave , NE Redmond, WA 90852
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Overnight	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hand Mail	James B Wright Sprint 14111 Capital Boulevard Wake Forest, NC 27587
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Overnight	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hand Mail	Charles McKee Sprint PCS 6450 Sprint Parkway, MailStop 2A553 Overland Park, KS 66251
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Overnight	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hand Mail	Elaine Critides Verizon Wireless 1300 I Street, N.W. Washington, D.C. 20005
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Overnight	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hand Mail	Dan Menser Sr Corporate Counsel T-Mobile USA, Inc. 12920 SE 38 <sup>th</sup> Street Bellevue, WA 98006
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Overnight	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hand Mail	Marin Fettman Corporate Counsel, Regulatory Affairs T-Mobile USA, Inc. 12920 SE 38 <sup>th</sup> Street Bellevue, WA 98006
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Overnight	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hand Mail	Leon M. Bloomfield Wilson & Bloomfield LLP 1901 Harrison St., Suite 1630 Oakland, CA 94612
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Overnight	

  
 Melvin J. Malone  
 J. Barclay Phillips  
 Miller & Martin, PLLC